

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

THOMAS DEXTER JAKES,

vs.

DUANE YOUNGBLOOD,

JOHN DOE 1,

JOHN DOE 2,

JOHN DOE 3,

JOHN DOE 4,

JOHN DOE 5,

JOHN DOE 6,

JOHN DOE 7,

JOHN DOE 8,

JOHN DOE 9, and

JOHN DOE 10,

Defendants.

Case No. 2:24-CV-1608-WSS

**AFFIDAVIT OF THOMAS DEXTER
JAKES IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
MOTION TO DISMISS**

THOMAS DEXTER JAKES, being duly sworn, states as follows:

1. I am Thomas Dexter Jakes, the plaintiff in the above-referenced action, and I live in Dallas, Texas.

2. I have reviewed the affidavits of Duane Youngblood and Richard Youngblood submitted in support of the motion to dismiss. The statements in these affidavits purport to describe situations where I harbored carnal desires for these men. These statements are knowingly and flagrantly false. I am repulsed by these defamatory accusations and the \$6 million extortion letter I received from Duane Youngblood's attorney, Tyrone Blackburn. (Attached hereto as Exhibit 25 is the Blackburn Letter).

3. For years, I have been counseled to ignore the constant stream of low-level smears against my reputation. However, the emotional and physical toll of this coordinated campaign of

lies, designed to damage my reputation and legacy, has become overwhelming. The pain it has caused my wife of 43 years and my five children, whom I have always loved, nurtured, and provided for, is simply too much to bear. Every person has a breaking point. I have reached mine. I authorized this lawsuit because I can no longer remain silent.

4. My calling to preach the Gospel began at a young age. In 1980, I founded Greater Emmanuel Temple of Faith, a small storefront church in Smithers, West Virginia (attached hereto as Exhibit 26 is a photograph). With a congregation of just ten people, I traveled to coal mining towns throughout the state, spreading the Gospel. This was a true testament to humble beginnings.

5. In 1982, I married my wife, Serita. I embraced her two children from a previous relationship as my own. Tragically, just six months into our marriage, a near-fatal car accident left Serita with debilitating injuries, confining her to a wheelchair for nearly a year. That same year, I lost my job at the Union Carbide Chemical Plant due to its closure, further compounding our already difficult financial situation. To feed my family, I worked nights digging ditches for gas lines with my brother. But even this arduous labor was often insufficient.

6. It is within this context – the reality of my life in 1986 – that Duane Youngblood makes his preposterous claim, nearly 40 years later, on the Larry Reid Live podcast, that I promised him lifelong financial support in exchange for sex “whenever” I visited Pittsburgh. This assertion is not only ludicrous; it is a bald-faced lie.

7. To be clear: while I occasionally travelled to Pennsylvania around 1986 to preach at area churches that were part of the Greater Emanuel International Fellowship network, I never tried to corner, grab, or kiss any teenagers. I never phoned Duane Youngblood to proposition him for sex in exchange for financial support. And I never groomed, sexually abused, sexually

assaulted, and engaged in predatory conduct of a sexual nature towards Duane Youngblood. I never apologized to Youngblood for any such conduct, because it did not happen.

8. During that period, I was barely keeping my own family out of poverty. I was not the “Bishop TD Jakes” of today. I was a pastor with no substantial following, and no financial resources. My home was a small, wood-framed structure (attached hereto as Exhibit 27 is a photograph of the house). There were no signs of prosperity. My life was consumed with providing for my family, often amidst severe hardship. There were numerous nights when my wife and children returned to a home without water or electricity. I often share the story of how I turned the shame of utility shutoffs into a game with my two oldest sons, then just five and six years old, seeing who could reach their rooms without stubbing their toes in the dark.

9. My circumstances began to improve in 1992. I managed to scrape together enough money to travel to Tulsa, Oklahoma, for the AZUSA 92 evangelical conference. Initially, I was largely ignored. However, my fate changed on the second day when I was introduced to prominent evangelist Carlton Pearson by Sarah Jordan Powell. His support led to a speaking engagement at the following year’s conference, AZUSA 93. There, my sermon, “Woman Thou Art Loosed,” resonated powerfully with attendees and launched me into national prominence. Before this pivotal moment, my ministry was a modest, local calling.

10. Today, I have diversified my income streams as an author, film producer, real estate developer, and more. However, during the time period referenced by Duane Youngblood, I had none of this.

11. In my 68 years, my only involvement with the justice system has been primarily through the Texas Offenders Reentry Initiative (T.O.R.I.), a faith-based program that helps formerly incarcerated individuals reintegrate into society. Through T.O.R.I., we have assisted over

40,000 individuals in rebuilding their lives by providing support in employment, education, housing, healthcare, spiritual guidance, and family reunification.

12. I now find myself defending my character and integrity against two convicted felons acting at the behest of an overzealous blogger attempting to extort \$6 million from me.

13. Duane Youngblood claims to have “confronted” me about the alleged attempted kiss. Yet, I had never heard a whisper of this supposed incident until his appearance on the Larry Reid Live podcast. Although Duane blames this conjured up incident as an excuse for his abhorrent behavior, it is my understanding that he never brought any of this up as a defense in either trial that resulted in him spending half of his life in prison. I nor anyone he is now maligning was brought up in either trial. Make this make sense! If this event truly occurred and was as traumatic as he claims, why has it never surfaced in any of Duane’s own molestation cases, where such a detail would have been paramount to his defense?

14. It is with deep sadness that I find myself responding to these egregious and defamatory claims. My willingness to address them does not diminish the need for justice. I am one of many who have been targeted by these malicious individuals. My commitment extends beyond defending myself; it includes exposing these individuals and their tactics, which often prey on those who lack the resources to defend themselves against such calculated attacks disguised as truth-telling. I must add, the inconsistencies in Duane Youngblood’s narrative are too numerous to address comprehensively. His story changes with every telling. Initially, he claimed I tried to kiss him. In a separate interview, he stated I blocked him from leaving (which is completely out of character for me). His latest claim is that he was driving me home after a birthday party.

15. Duane Youngblood has also implicated two other pastors, accusing one of groping him during a massage. Yet, he has made no demands against that individual. He accuses me of

merely “trying to hug and kiss him,” yet seeks to extract \$6 million. Why this discrepancy? If I am as reprehensible as he portrays me, why did he join the organization where I served as a vice bishop, leave, and then subsequently rejoin?

16. Regarding Richard Youngblood’s claims: While I frequently traveled to Pittsburgh during that period, Richard and I, as two adult men, were perfectly capable of making the four-hour trip from Charleston, West Virginia, without requiring an overnight stay at a motel. I categorically deny ever getting into bed naked and propositioning Richard. Furthermore, if he genuinely believed me to be a threat, why did he later approach me approximately 10 years ago (in Nashville, Tennessee, at a TBN event) about a job at The Potter’s House? His story surfaced only after I declined to hire him due to his lack of qualifications. Richard has a history of instability. He hasn’t been able to maintain a job, he has multiple children with different women, and a felony conviction for failure to pay child support. It’s difficult to respect a man who doesn’t take care of his children.

17. In all my years, I have never initiated a lawsuit against anyone. We filed this lawsuit against individuals who were supposed to be men of God but are clearly not. The catalyst for this action was not simply the nature of the accusations but the relentless attacks by the overzealous blogger. I have faced many attacks in my life, but none like this. Even so, I feel compelled to stand up against these bullies.

18. This is a carefully orchestrated attempt to destroy me. An overzealous blogger publicly solicited individuals to make accusations against me, not for victims to come forward, but for anyone willing to fabricate stories. He explicitly stated his strategy in one of his podcasts before his interviews with Duane: “The claim doesn’t have to be true... it just needs to be filed... Once it’s filed, I can talk about it on my show!” Richard and Duane Youngblood responded to this call.

They are working in concert, relentlessly targeting me and my family with vicious, unfounded attacks. I spent the past year enduring their vicious attacks, lies, rumors of my wife leaving, rumors of my church abandoning me, and so much more... All of this was happening while I found myself helping my wife recover from knee replacement surgery and while helping my brother navigate kidney failure. This unwarranted stress brought me to a place of having a health crisis on stage in front of my entire congregation. As a guy who'd had no previous health challenges, this near-death experience was a turning point for me. Enough is enough!

19. I suspect a larger network is involved in this scheme, all anticipating a share of this attempted "money grab." Duane's ambition and confidence in extorting \$6 million from me are evident in his pre-emptive actions: establishing a website, commissioning artwork, hiring a publicist, and announcing the launch date for not one, but two books: a "tell-all" about me and another entitled "How to Get Rich." All of this was in motion before I even received the \$6 million extortion letter from Blackburn.

20. Blackburn has stated that he is not being paid by Duane. If this is true, the question must be asked: who is funding Blackburn's efforts? The only logical explanation is that he fully expected me to succumb to the pressure of his false accusations and pay him \$6 million to remain silent. Finally, Duane and the overzealous blogger had already publicized this fabricated story. Why would I pay them "not to tell" something they had already broadcast to the world? This tactic aligns with Tyrone Blackburn's established pattern of behavior.

21. This entire smear campaign began shortly after the public announcement of a commitment from Wells Fargo of up to \$1 billion for community redevelopment. This initiative is designed to provide quality affordable and workforce housing, broadband access for children lacking adequate internet service, fresh grocery options in food deserts, job creation and training,

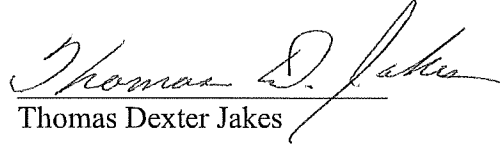
and comprehensive support services for underserved and undercapitalized communities. This partnership was never intended for my personal gain; it is a testament to my commitment to giving back to the community that has supported me for decades.

22. In summary: I have no ulterior motive. I desire peace, accountability and an end to this harassment. I pray for an expeditious resolution to this matter, one that respects the integrity of the federal court process and allows me to continue the work that is most dear to my heart: investing in the lives of those most in need. My deepest concern is that others will be victimized by their vicious, collaborative tactics. Unless the law intervenes, this pattern of abuse will continue.

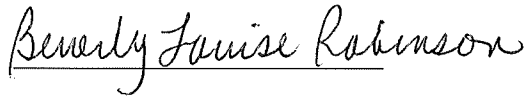
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I declare under penalty of perjury that the foregoing is true and correct.

DATED: February 14, 2025


Thomas Dexter Jakes

Sworn to me before this 14th day of February 2025.



Notary Public

